Response to Docket No. 125-133
"Re: Delete, Delete, Delete"

From:
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I am pleased for the opportunity to submit my comments on the FCC's recent Docket No. 125-133 in response to President Trump's mandate to eliminate as many unnecessary and outdated regulations in federal agencies as possible.

The Media Bureau, which is the department I am most familiar, has been suffering for decades with archaic and oppressive rules that have limited resources, innovation, and opportunity, particularly with aspiring broadcasters of limited financial means.

My greatest interest is in the AM spectrum: medium wave, long wave, and shortwave. I want to see AM radio made great again. But that will never happen if we don't get rid of the attitude in the Media Bureau that AM is an aging grandparent with one foot in the grave and the other in hospice. As a result, the rules and policies of the Media Bureau have made abundant and desperately needed space in the AM spectrum nearly impossible to obtain.

There are only two entities responsible for AM radio's 40 year decline: the radio manufacturers and the FCC itself, dating back to the AM Stereo debacle of the 1980's. Both entities have been slow to acknowledge and correct their mistakes and often cop out with some form of damage control, such as allowing AM stations to have FM translators.

Therefore, with the goal of eliminating this current inefficient use of spectrum, as well as the many silly regulatory burdens, I recommend the following changes in the way the FCC conducts its business:

1) Eliminate the filing window system and revert to the original first come, first serve, apply-when-you-are-ready policy. In my estimation, this change should be for the entire wireless communications spectrum. Major or minor changes to a facility should not have to wait for some filing window that an inefficient FCC waits years or decades to open.

The LPFM application process is a perfect example of the frustrations the filing window system causes. Filing windows for LPFM have been occurring only once every 10 years. On the AM band, filing windows seem even more elusive. With the competition there has been for LPFM frequencies in metropolitan areas, many MX LPFM applicants have no alternatives, even though there is still plenty of room to move their applications to the AM band in those markets. Furthermore, the concept of LPFM was developed by and for community and government non-profits. It is highly regulated and not an appropriate medium for broadcast entrepreneurs.

Having all broadcast licenses awarded on merit will also eliminate a lot of ghost applications for CP's won by chance in a lottery and resold at a profit. An applicant should be who they claim to be and have concrete plans for a new or modified facility. With such a system, only those seriously interested in

broadcasting (and ready) would apply. It would eliminate those who apply just because a filing window is coming up and they want to get in the running.

2) Completely eliminate nonsensical, time wasting EOE requirements for radio stations. Broadcasters should be free to hire or associate with whomever they please and hire solely on merit. The President is correct - we need to return to a merit based society again. If you didn't get hired, stop assuming your race had something to do with it. This is 2025 America, not 1955 America. We also need to end government funding of all domestic broadcasting, especially NPR and PBS, whose values and viewpoints 60 percent or more of the American public disagree with. There is no reason why the more popular programming on such networks can't survive in a free and open marketplace without government funding. (For example, classical music survived for decades solely on commercial stations. There is no reason why that can't happen again.)

3) We need to get the FCC out of the business of promoting certain parts of the media spectrum over others (i.e. FM over AM and shortwave) based on whether it thinks a proposed facility would be financially viable. Concern over financial viability should be none of the FCC's business. With today's technology, it is possible to consistently operate a broadcast facility that doesn't earn a dime on its own, but is financed through another business or job the licensee has, or a spouse, relative or friend.

4) Current rules state that if an AM station is off the air for more than one year, the license is permanently deleted. Likewise, when an AM broadcaster voluntarily turns in a license, it is also permanently deleted. THIS IS A COLLOSAL WASTE OF RESOURCES. Yes, the current licensee should loose the license after a full year off the air. But at that time, the license should go into a restoration pool for others to claim, and it should stay there unless modifications to other effected stations no longer make the original engineering viable.

I would like to see dark AM stations with deleted licenses available for restoration, even if they were last on air 60 years ago, as long as the engineering basically works, but modifications of all kinds should be accepted. Preference should be given to new broadcasters who have not been previously licensed. If the original transmitter site and towers, ground system, and coverage footprint are still available, the new broadcaster should be able to revive the facility without an engineering study. Between that savings, and help from the Incubator Program for Radio Broadcasters, even the most financially disadvantaged broadcaster should be able to make a go of such an opportunity. As for current licensees and construction permit holders, modifications to those facilities should be available any time the licensee is ready to apply for them. Life is too short to wait for a window!

5) The restriction against new, daytime-only AM stations should be lifted. Applications by current broadcasters changing to a frequency where only daytime operation works, or simply downgrading to daytime-only for interference reasons, should also be accepted. With the ability of AM stations to have 24-hour FM translators and internet streams, this 1980's rule is obsolete.

6) Several years ago, the FCC approved digital-only broadcasting in the AM band. With only 4 (and occasionally 5) stations currently broadcasting in this mode, it has been anything but popular. I believe the traditional AM band needs to be preserved in its original analog state, with C-Quam AM stereo strongly encouraged, along with Amax AM receiver standards. The antique radio restoration hobby has become very popular in recent decades. It would be a shame to lose 100+ incredible years of radio receiver design and engineering, and all hobbyist restoration efforts, only to render these radios obsolete through conversion to digital-only transmitting.

I think we should explore the possibility of opening the now near-empty longwave band to digital-only simulcasting of current AM stations. 150-300 kHz would be a good start. My understanding is that the remaining airport beacons will be decommissioned by 2026. If any do remain, they can be moved above 300 kHz, as well as “Lowfer” transmissions.

Signals in the longwave band travel quite far on little power. Any noise produced by household and industrial power systems that interfere with analog longwave won't be heard in digital. The superior range will be needed for the digital signals to match the medium wave analog range. Long distance reception of digital signals at night would remain possible. Perhaps multicasting with one additional channel can work but this will have to be tested.

7) Raise the current license-free, Part 15 power restrictions in the expanded AM band (1610-1710 kHz) from 100 milliwatts to 1 watt and designate the frequency of 1710 kHz for Part 15 broadcasting only. The current antenna restrictions can remain, or antennas up to 50 feet can be legalized with the permissible power raised to perhaps 500 milliwatts. Remove the current restriction mandating a directly coupled antenna to allow the transmitter (“intentional radiator”) to be housed inside a building and coupled to its outdoor antenna through 50 ohm cable. Also allow for directly coupled ground connections of any length. (Part 15 “intentional radiator” rules for all other parts of the spectrum, including the AM band below 1610 kHz, can remain the same.)

I am very familiar with Part 15 broadcasting in the expanded AM band and have worked with around a dozen installations since the 2000's. I know its potential, in that just 3 well placed transmitters, even at current power restrictions, can cover 60-80 percent of a medium sized city with a population of 200,000. The FCC is long overdue for establishing a license free class of low power AM station that anyone with a $2,000 budget can utilize if they do the research and take the initiative.

Such an enhanced Part 15 class of station is a good fit with the President's plan to divest of excess federal
land and build 10 new communities of opportunity on parts of it. It will enable these new communities to establish local radio services quickly without the expense, time, and uncertainty involved in an FCC application. Zero interference to existing facilities would be likely while the establishment of such a class could end the stubborn irritant of pirate radio which wastes a lot of FCC time and resources.

8) Ease enforcement of language restrictions for all broadcasters to enable on-the-fly use of internet program sources that haven't been adequately screened in advance. No, I do not enjoy tuning in to a stream of cuss words on the radio. But we must be realistic about the age in which we live. Small stations with minimum staff do not have time to screen every word in a program they know has value but may or may not have cuss words in it. No broadcaster should be in fear of being fined or loosing their license because of cuss words that anyone with a smart phone listening to the same program on line can hear, and no citizen or citizen's group should have the
power to put a broadcaster's license in jeopardy merely for the intentional or unintentional airing of cuss words.

This fear is a major reason why most broadcasters default to the same limited programming options in market after market. As a result, legacy media is being paled into insignificance by the internet's independent media and vastly superior choices. The only way to stop this, quite frankly, is to allow legacy media the same nearly infinite programming options the internet offers. Legacy media also reaches an older demographic that is not as computer savvy. Without internet sources rebroadcast on legacy media, these people are left out. But we can't reach them with these voices unless we remove the

punishments for airing cuss words.

9) Explore the possibility of domestic broadcast use for parts of the shortwave spectrum with a license-free option of power up to 10 watts with simple non-directional vertical antennas. This would require complex study and international agreements which would be too involved to detail here. Over the past decade, use of shortwave for international broadcasting has decreased precipitously, leaving large amounts of that spectrum unused. It may be possible for stations with unique programming to simulcast on shortwave so they can be heard at greater distances interference free. Part 15 AM and LPFM stations could opt for a 10 watt unlicensed option to extend their limited ranges.

10) Promote and publicize the Media Bureau's Incubator Program for Radio Broadcasters, which was instituted during the first Trump administration to enable aspiring broadcasters of limited financial means to piggyback their startups on the shoulders of profitable, existing companies. Had this program been available when I was in my 30's, I would have owned stations since that time. Today, I am over 70; I own Part 15 facilities only and still have not ventured toward licensed stations due to the expense and restrictions. As for promoting this program to existing broadcasters, a big selling point is the fact that their sales reps would have an additional service to add to their portfolios which should open the possibility for accounts they would not have secured otherwise. This program is a good idea that I hope can be sustained.

My thanks to the FCC and Chairman Carr for the opportunity to comment on this docket.

Jeffrey Gill